

Pacific Islands Health Officers Association

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Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Dear Chairman Powell:

This letter is in response to the Federal Communication Commission's (FCC) Notice of Proposed Rulemaking in the matter of the Universal Service Rural Health Care Support Mechanism, FCC-02-122, (WC Docket No. 02-60). These Reply Comments primarily address Section III.C.4. – "Insular Areas", although some comments also address Section III.D.3.c. "Encouraging Partnerships with Clinics at Schools and Libraries", Section III.C.1 - "Interpretation of Similar Services and Urban Area", and Section III.C.2 – "Urban Area".

We commend the FCC for issuing this Notice of Proposed Rulemaking that provides an opportunity to comment on the issues affecting the regulations governing insular jurisdictions. However, we need to note that five years have passed since the original order was issued and to date, the most rural, remote and needy jurisdictions of our nation: American Samoa, Guam and the Commonwealth of the Northern Mariana Islands have yet to benefit from the Rural Health Provider program, even though their telecommunication carriers and consumers pay into the fund.

The Pacific Islands Health Officers Association (PIHOA) is a non-profit association representing the collective health interests of the six US Pacific Jurisdictions made up of the three Territories (Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands-CNMI) and three Freely Associated States (Republic of Palau, Republic of the Marshall Islands, and the Federated States of Micronesia-FSM). PIHOA is a consortium of all six US Pacific Island Jurisdictions' Ministers and Directors of Health. PIHOA's mission is to "develop the US Pacific Island Jurisdictions' health infrastructure so Accessible, Cost-Effective, and Quality health care can be provided."

The US Territories (Guam, American Samoa and the Commonwealth of the Northern Mariana Islands), along with the three Pacific US Freely Associated States (Republic of Palau, Republic of the Marshall Islands and the Federated States of Micronesia), all face significant geographic isolation, poverty, and health professional shortages, as well as high rates of diseases compared to the rest of the United States. Despite extreme need, these jurisdictions have not

been able to benefit from the FCC's Universal Service Rural Health Care Program, even though their telecommunication providers and consumers contribute to the Universal Service Fund.

Two simple changes could greatly benefit these US Pacific Jurisdictions. First, designate Honolulu, Hawaii, which is the nearest urban center with specialty and tertiary care and with health professions training and continuing medical/health education programs to each of the territories, as the "urban area" for determining the Rural Health Care subsidy. Second, calculate the American Samoan subsidy as is currently done for Alaska, where many villages are dependent on satellite for communication and information.

PIHOA believes the Commission's actions on this issue will mean that more of the limited health care dollars available in these US Pacific Jurisdictions will be utilized for health and public health services, by directly serving the US Territories and indirectly the US Freely Associated States, thereby serving a greater number of people and more adequately protecting the public's health. We also believe that as access to health care is enhanced and health status improves, Federal dollars provided to the territories under other programs, such as Vocational Rehabilitation, will be able to focus on rehabilitation services rather than be also needed for health care services. Acting on these recommendations will also mean that our veterans in American Samoa, Guam and CNMI will have access to the health care due them.

Given the geographic isolation and time differences, the Pacific jurisdictions also lack access to timely, relevant health and public health technical assistance and administrative services. We believe that reasonable telecommunication costs will enable these jurisdictions to: (1) easily communicate with Federal program officials, (2) obtain health-related technical assistance both now, and (3) respond to both natural disasters and terrorism.

PIHOA therefore concurs with the American Samoa Telecommunication Authority, PEACESAT, and the Guam Memorial Hospital Authority that Honolulu, Hawaii be designated as the urban area for determining the universal service rural health care subsidy for the US Pacific Flag Territories. .

Thank you for the opportunity to provide these comments.

Sincerely,

Robert V. Tucker, MT, MPH, DrPH
Executive Director, PIHOA

cc Dr. Eliuel Pretrick, PIHOA President
Cathy Wasem